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REMARKS

The indication of allowable subject matter in claims 6, 7 and 14 is acknowledged and appreciated. In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

Claim 1 stands rejected under 35 U.S.C. § 112, second paragraph. It is respectfully submitted that the enclosed amendment obviates this rejection. Accordingly, it is respectfully requested that this rejection be withdrawn.

Claims 1-5 and 13 stand rejected under 35 U.S.C. § 102 as being anticipated by Applicants' admitted prior art (AAPA). Claim 1 is independent. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "*removing* a region of the buffer coat film extending from an edge of the wafer and located on the whole periphery region having a certain distance from the periphery of the wafer." In contrast, AAPA does not suggest an affirmative step of removing the buffer coat film at the edge of the wafer, but instead, the *initial* buffer coat film formed on the substrate (i.e., before apertures 308a are formed) does not appear to extend to the wafer edge to begin with. Hence, there is no removing step at the wafer edge. AAPA discloses only forming "a buffer coat film 308 ... above the substrate by a spin coating method ... [and thereafter] parts of the buffer coat film 308 respectively located on the bonding pads 304 and the scribe line regions 310 are removed ..." (see page 1, lines 22-25 of Applicants' specification). AAPA is silent as to removing a region of the buffer coat film extending from an edge of the wafer.

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Indeed, when the initial buffer coat film 308 is formed on the wafer 302 (not shown, step between Figures 20A and 20B), the film 308 does not appear to be formed at the wafer edge, so that the only portions affirmatively removed are those on the bonding pads 304 and scribe line regions 310 as expressly described by AAPA. Because of this deficiency, AAPA is subject to the polishing slurry permeating inside through the edge as described in Applicants' specification. In order to obviate this deficiency, one exemplary process can be used in which the buffer coat film is formed over the *whole* substrate whereby a part of the buffer coat film located *on the periphery region from the edge of the wafer* is removed (*see, e.g.,* Figure 3 and page 7, lines 14-20 of Applicants' specification).

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that AAPA does not anticipate claim 1, nor any claim dependent thereon.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

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Based on all the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

Having fully and completely responded to the Office Action, Applicants submit that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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